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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JACQUELYNN BORTOLAMEDI,
Plaintiff,
v.
NANCY A. BERRYHILL,
Acting Commissioner of Social Security,
Defendant.

Case No. 2:17-cv-01473-JAD-PAL

**UNOPPOSED MOTION FOR
EXTENSION OF TIME
(SECOND REQUEST)**

Defendant Nancy A. Berryhill, Acting Commissioner of Social Security ("Defendant") respectfully requests that the Court extend the time for Defendant to file her Cross-Motion to Affirm in response to Plaintiff's Motion for Judgment (Dkt. No. 13) due on December 28, 2017, by 30 days, through and including January 29, 2018. Defendant further requests that all subsequent deadlines set forth in the Court's Order Concerning Review of Social Security Cases (Dkt. No. 10) shall be extended accordingly.

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1 Defendant requests this extension because of her attorney's heavy workload for the months of
2 December 2017 and January 2018, including four other district court cases that require imminent
3 briefing by January 5, 2018 and four personnel-related litigation pending before the Equal Employment
4 Opportunity Commission that require completion of deposition and written discovery by February 2,
5 2018. This request is made in good faith with no intention to unduly delay the proceedings.

6 Counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to this motion,
7 on December 27, 2017.

8 Respectfully submitted, December 27, 2017.

9 STEVEN W. MYHRE
10 Acting United States Attorney

11 /s/ Beatrice Na
12 BEATRICE NA
13 Special Assistant United States Attorney

14 IT IS SO ORDERED:

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16 UNITED STATES MAGISTRATE JUDGE

17 DATED: January 4, 2018
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1 **CERTIFICATE OF SERVICE**

2 I, **BEATRICE NA**, certify that the following individual was served with a copy of the
3 **UNOPPOSED MOTION FOR EXTENSION OF TIME (Second Request)** on the date and via the
method of service identified below:

4 **CM/ECF:**

5 Daniel S. Jones
6 Law Offices of Charles E. Binder and Harry J. Binder, LLP
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8 New York, NY 10022
9 212-667-6801
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17 Dated: December 27, 2017

18 /s/ Beatrice Na
19 BEATRICE NA
20 Special Assistant United States Attorney
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